

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

TOSATTI PADMORE,

Defendant

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CRIMINAL CASE NO. 12-CR-61-PB

MOTION TO ENTER TC PROGRAM

NOW COMES the defendant, TOSATTI PADMORE, by and through counsel, and hereby moves this Court to allow the defendant to enter into the TC Program at the Strafford County House of Correction. Attorney William Morse, Assistant U.S. Attorney, has no objection to this Motion. In addition, Jake Collins, of the TC Program at the Strafford County House of Corrections said that Tosatti Padmore would be a good candidate for this Program and there should be a bed available for him shortly.

WHEREFORE, the defendant respectfully requests that this Court grant the within Motion to Enter the TC Program at the Strafford County House Of Correction.

Respectfully submitted
Tosatti Padmore,
By his Attorney,

Date: April 12, 2013

/S/Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 12th day of April, 2013, a copy of the within was e filed to the United States Attorney's Office, parties of record and mailed, postage prepaid, to Tosatti Padmore.

/S/Paul J. Garrity
Paul J. Garrity